

**COURT OF COMMON PLEAS****BROWN COUNTY, OHIO****KATHRYN LAWS, et al** :**NO:****Plaintiffs** :**v.** :**DR. F. BRUCE WATKINS, et al** :**Defendants** :**INTERROGATORIES, REQUEST FOR ADMISSIONS AND REQUESTS FOR PRODUCTION OF DOCUMENTS ADDRESSED TO DEFENDANT, F. BRUCE WATKINS.**

Come now Plaintiffs and hereby request that the Defendant, F. Bruce Watkins, M.D., respond to the following Interrogatories, Request for Admissions and Demand for Production of Documents within twenty-eight (28) days of receipt thereof and pursuant to Rules 33, 34 and 36 of the Ohio Rules of Civil Procedure.

**INSTRUCTIONS FOR ANSWERING**

1. All information is to be divulged which is in your possession.
2. Where an interrogatory calls for an answer in more than one part, each part should be separated so that the answer is clearly understandable.
3. You are reminded that all answers must be made separately and fully and that an incomplete or evasive answer is a failure to answer.
4. You are under a continuing duty to seasonably supplement your response with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, the identity of any person expected to be called as an expert witness at trial, and the subject matter on which he/she is expected to testify and to correct any response which you know or later learn is incorrect.

5. Spaces for your answers have been provided beneath each interrogatory; should there not be sufficient space to complete your answers you may complete them in sequence on a separate appendix attached to the answers and identified appropriately.

### **INTERROGATORIES**

1. Please provide your full name, current residential address, current business address, date of birth and Social Security Number.
  
  
  
  
  
  
  
  
  
  
1. Please identify by name, current address and telephone number all lay witnesses that you anticipate calling.
  
  
  
  
  
  
  
  
  
  
2. With respect to the foregoing witnesses, please summarize their anticipated testimony.
  
  
  
  
  
  
  
  
  
  
3. Please identify by name, current address, education, work history, publications, lecturing and/or teaching experiences of all expert witnesses that you anticipate calling. (If a current curriculum vitae is available, a copy of it will be a sufficient response to this interrogatory).

- (a) Please state in detail all opinions held and/or conclusions arrived at by said expert(s).
4. Please describe in detail all exhibits that you anticipate offering into evidence at the trial of this matter.
5. Please provide copies of any and all statements, correspondence of any kind or description including notes taken from Plaintiffs or agents of Plaintiffs.
6. Please describe your business relationship with Brown County General Hospital and Health Center in April of 1999.
7. Please describe your business relationship with Southern Ohio Health Center in April of 1999.

8. Please describe your business relationship with Southern Ohio Health Services Network in April of 1999.
9. Please state the name and address of all liability insurers who insured you for acts of negligence during the years of 1997, 1998, 1999 and 2000, together with the amounts of liability provided by said carriers.
10. Please state whether or not any claims for medical negligence have ever been asserted against you.
11. If the answer to the foregoing is in the affirmative, please state the name(s), date(s) of all person(s) making such claims, together with the nature of the claim(s) and the date(s) of said claim(s).

12. Please state whether or not you have ever been sued for medical negligence.
13. If the answer to the foregoing is in the affirmative, please state the name of the Plaintiff(s), the Court in which said case(s) were filed, the case number(s) and the resolution(s) of such claim(s) and/or if it/they are still pending.
14. Please state whether you are Board Certified or Eligible and, if the answer is yes, in what areas of practice.
15. Please state the date of your original medical licensure in the State of Ohio.
16. Please state the name, address and position held of all medical personnel who assisted in the medical care and treatment of Kathryn Laws during the years 1998 and 1999.

**PRODUCTION OF DOCUMENTS**

17. Please provide for inspection and/or copying copies of all medical records and bills pertaining to the medical diagnosis, care and treatment of Plaintiff, Kathryn Laws and/or Baby Boy Laws, nka Gregory Lowell Laws.
18. Please provide a copy of all exhibits that you intend to produce at the trial of this matter.
19. Please provide copies of all of the Declaration Pages and complete copies of all of the policies described in interrogatories numbered 9
20. Please provide copies of any and all claims and/or lawsuits filed against you.

21. Please provide copies of your Federal, State and Local Income Tax Returns 1998 and 1999.
20. Please provide a copy of your Curriculum Vitae.

**REQUEST FOR ADMISSIONS**

22. Please admit that you were responsible for the prenatal care of Kathryn Laws and delivered her child, Baby Boy Laws, on the 11<sup>th</sup> of April, 1999.
23. Please admit that you failed to do an episiotomy prior to delivery.
24. Please admit the failure to do an episiotomy under the circumstances of the birth of Baby Boy Laws by Kathryn Laws was a deviation from the Standard of Care in the Brown County, Ohio community.

25. Please admit that you attempted a forceps delivery when Baby Boy Laws' head had not properly presented.
26. Please admit that the use of forceps in a delivery when Baby Boy Laws' head had not properly presented was a deviation from the Standard of Care in the Brown County, Ohio community.
27. Please admit that you attempted to suction Baby Boy Laws to force the natural childbirth.
28. Please admit that the use of suction to force the natural child birth of Baby Boy Laws was a deviation from the Standard of Care in the Brown County, Ohio community.
29. Please admit that you attempted to deliver the child through the birth canal when it had not yet fully or adequately dilated.



30. Please admit that the attempt to deliver the child through the birth canal when it had not yet fully or adequately dilated was a deviation from the Standard of Care in the Brown County, Ohio community.
31. Please admit that as a result of the delivery of Baby Boy Laws that Kathryn Laws sustained a tear that extended into the peritoneal body and behind the left labia majora to such a degree that fingers could be placed into those defects.
32. Please admit that the Kathryn Laws sustaining a tear that extended into the peritoneal body and behind the left labia majora to such a degree that fingers could be placed into those defects was a deviation from the Standard of Care in the Brown County, Ohio community.
33. Please admit that the delivery of Baby Boy Laws caused bilateral tears of the vulva and a complete separation of the sphincter.

34. Please admit that the bilateral tearing of the vulva and a complete separation of the sphincter during the delivery of Baby Boy Laws to Kathryn Laws was a deviation from the Standard of Care in the Brown County, Ohio community.
35. Please admit that if Baby Boy Laws had been delivered by Cesarean Section that Kathryn Laws would not have sustained the injuries described in Requests for Admissions numbered 30 through 33.

Respectfully submitted,

McINTOSH & McINTOSH

By \_\_\_\_\_  
Michael Todd McIntosh  
Reg. #0061523  
Trial Counsel for Plaintiffs

By \_\_\_\_\_  
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Reg. #0013525  
Trial Counsel for Plaintiffs

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Cincinnati, Ohio 45202  
513-929-4040

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing has been served on the Defendants this \_\_\_\_  
day of April, 2000.

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